

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

IN RE:)	
)	
A&R CHAVIRA, LLC,)	Case No. 23-30067-HCM
)	Chapter 11
Debtor.)	

**MOTION FOR FIRST EXTENSION OF TIME TO FILE SCHEDULES AND
STATEMENT OF FINANCIAL AFFAIRS PURSUANT TO BANKRUPTCY RULE 1007,
LOCAL RULE 1007 & 11 U.S.C. 105(a)**

TO THE HONORABLE H. CHRISTOPHER MOTT, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW A&R Chavira, LLC, Debtor in this Chapter 11 proceeding (the “Debtor” and/or “A&R”), by and through its attorneys of record MIRANDA & MALDONADO, P.C., and files this *Motion for First Extension of Time to File Schedules and Statement of Financial Affairs Pursuant to Bankruptcy Rule 1007, L. Rule 1007 and 11 U.S.C. Section 105* (the “Motion”). In support of its *Motion*, the Debtor would show the Court the following:

1. On January 24, 2023 (the “*Petition Date*”), the Debtor filed a *Voluntary Petition for Relief* under Chapter 11 of the United States Bankruptcy Code (the “*Code*”).
2. The Chapter 11 case was filed on an emergency basis.
3. The deadline by which to file the *Schedules of Assets and Liabilities* and *Statement of Financial Affairs* is February 7, 2023.
4. The Debtor requests an extension until February 21, 2023, to file its *Schedule of Assets & Liabilities* and *Statement of Financial Affairs*. As grounds for the extension, the Debtor’s principal, Mr. Alexander Chavira, and the Attorney for the Estate have been

working with a senior secured creditor on cash collateral issues as well ensuring the accuracy of the vehicle inventory which fluctuates daily.

5. There have been no prior requests for an extension of time within which to file *Schedules of Assets & Liabilities* and *Statement of Financial Affairs*.

WHEREFORE, PREMISES CONSIDERED, the Debtor requests that this Court issue an Order which provides for the following:

- a. An extension of the time to file *Schedules* and *Statement of Financial Affairs* until February 21, 2023, and,
- b. For such further relief as the Debtor may show itself justly entitled to.

Respectfully submitted,

MIRANDA & MALDONADO, P.C.

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CERTIFICATE OF SERVICE

I certify that on the 7th day of February 2023, a copy of the foregoing document was served as provided by the Electronic Case Filing System for the United States Bankruptcy Court for the Western District of Texas to the parties listed on the attached Matrix.

/s/ Carlos A. Miranda, Esq.
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